

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:

Jeffrey Thomas Owens a/k/a Jeff Owens

DEBTOR(S)

Address: 554 Stephen Dr.
Hemingway, SC 29554

Last four digits of Social-Security or Individual Tax-
Payer-Identification (ITIN) No(s), (if any): 9849

CASE NO: 21-02133-jw

CHAPTER: 12

NOTICE, CHAPTER 12 PLAN, MOTIONS TO
VALUE SECURITY, AVOID JUDICIAL LIEN,
AVOID A NONPURCHASE-MONEY,
NONPOSSESSORY SECURITY INTEREST AND
LIEN, AND/OR TO ASSUME OR REJECT AN
EXECUTORY CONTRACT/UNEXPIRED LEASE

I. NOTICE TO CREDITORS AND PARTIES IN INTEREST: The debtor¹ has filed a chapter 12 bankruptcy case and listed you as a creditor or interested party. The debtor has filed the following chapter 12 plan and motions which may affect your rights. **Failure to object may constitute an implied acceptance of and consent to the relief requested in this document.**

II. MOTIONS TO VALUE SECURITY, AVOID JUDICIAL LIEN, AVOID A NONPURCHASEMONEY, NONPOSSESSORY SECURITY INTEREST AND LIEN, AND/OR TO ASSUME OR REJECT AN EXECUTORY CONTRACT/UNEXPIRED LEASE. The debtor requests that confirmation of this plan alter the rights of the following creditors named below.

DEADLINE FOR FILING OBJECTIONS, NOTICE OF HEARING ON MOTIONS: Objections to the motions and any provision of the plan must be made in accordance with SC LBR 9014-1, properly served, and filed with the United States Bankruptcy Court, 1100 Laurel Street, Columbia, SC 29201. Creditors and Parties in Interest will receive a separate notice setting a date and time for a pre-confirmation conference and a date and time for a hearing on confirmation of the Plan. Objections must be filed no later than the date and time set for the pre-confirmation conference. Timely objections will be heard at the confirmation hearing.

a) Lien avoidance. The judicial liens or nonpossessory, nonpurchase money security interests securing the claims listed below impair exemptions to which the debtor(s) would have been entitled under 11 U.S.C. § 522(b). Unless otherwise ordered by the court, a judicial lien or security interest securing a claim listed below will be avoided to the extent that it impairs such exemptions upon entry of the order confirming the plan. The amount of the judicial lien or security interest that is avoided will be treated as an unsecured claim in Part III(b) (4) to the extent allowed. The amount, if any, of the judicial lien or security interest that is not avoided will be paid in full as a secured claim under the plan. See 11 U.S.C. § 522(f) and Bankruptcy Rule 4003(d). If more than one lien is to be avoided, provide the information separately for each lien.

1. Nonpossessory, Nonpurchase-Money Lien: The debtor moves, pursuant to 11 U.S.C. § 522(f), to avoid the following nonpossessory, nonpurchase-money security interest and lien in household goods:

¹ When used herein, the term "debtor" shall apply as applicable either in the singular or in the plural, if there are joint debtors in the case.

Name of Creditor and description of property securing lien	Value of debtor's interest in property	Total of all other liens	Exemption	Estimated security interest/debt	Security interest not avoided (see III(b)(2)(ii) below)	Security interest to be avoided (see III(4) below)
_____	\$ _____	\$ _____	\$ _____	\$ _____	\$ _____	\$ _____

2. Judicial Lien: The debtor moves, pursuant to 11 U.S.C. § 522(f), to avoid the following judicial lien:

Name of Creditor and description of property securing lien	Estimated amount of lien	Total amount of all senior/unavoidable liens	Applicable exemption and Code section	Value of debtor's interest in property	Amount of lien not avoided	Amount of lien avoided
Crop Production Services, Inc	\$388,234.32	\$0	SC Code § 15-41-30(A)(1)	\$121,600	\$324,984.32	\$63,250
H&S Oil Co., Inc	\$76,120.30	\$388,234.32	SC Code § 15-41-30(A)(1)	\$121,600	\$12,870.30	\$63,250

Use this form for avoidance of liens on co-owned property only.

Name of the creditor and descriptio n of the property securing liens) the lien	Total equity (value of debtor's property less seni- or/unavoidabl e liens)	Debtor's equity (Total equity mul- tiplied by debtor's pro- portional interest in property)	Applicable exemption and Code section	Non- exempt equity (debtor's equity less exemptio n)	Estimated judicial lien	Amount of lien not avoided	Amount of lien avoided
_____	\$ _____	\$ _____	_____	\$ _____	\$ _____	\$ _____	\$ _____
_____			_____				

b) Request for valuation of security, payment of fully secured claims, and modification of unsecured claims. The debtor request that the court determine the value of the secured claims listed below. For each non-governmental secured claim listed below, the debtor state that the value of the secured claim should be as set out in the column headed Amount of secured claim. For secured claims of governmental units, unless otherwise ordered by the court, the value of a secured claim listed in a proof of claim filed in accordance with the Bankruptcy Rules controls over any contrary amount listed below. For each listed claim, the value of the secured claim will be paid in full with interest at the rate stated below. The portion of any allowed claim that exceeds the amount of the secured claim will be treated as an unsecured claim under Part 4 below. If the amount of a creditor's secured claim is listed below as having no value, the creditor's allowed claim will be treated in its entirety as an unsecured claim under Part 4 below.

The holder of any claim listed below as having value in the column headed Amount of secured claim will retain the lien on the property interest of the debtor or the estate until the earlier of:

- (1) payment of the underlying debt determined under nonbankruptcy law, or
- (2) discharge of the underlying debt under 11 U.S.C. § 1228, at which time the lien will terminate and be released by the creditor.

Name of creditor and description of property securing lien	Value of debtor's interest in property	Holder and amount of superior liens	Estimate of creditor's claim	Amount of secured claim	Unsecured claim after valuation
Crop Production Services, Inc- real estate- TMS 03-0412-074-01- 01-0 and 03-0412- 02-0 042-02-00	\$76,329	N/A	\$388,234.32	\$76,239	\$311,905.32
H&S Oil Co., Inc- real estate- TMS 03-0412-074-01- 03-0 and 03-0412- 042-02-00	\$76,329	Crop Production Services, Inc. – \$388,234.32	\$76,120.30	\$0	\$76,120.30
Crop Production Services, Inc- real estate- TMS 03-0412-042-00; 03-0412-072-00-00; 03-0412-073-00-00; 03-0412-076-01-00; 03-0412-070-01-00; 03-0412-074-00-00	\$377,163	FSA - \$25,340.29 ABB-\$218,503.68 ABB-\$292,853.04	\$388,234.32	\$0	\$311,905.32

H&S Oil Co., Inc	\$377,163	FSA - \$25,340.29	\$76,120.30	\$0	\$76,120.30
real estate- TMS		ABB-\$218,503.68			
03-0412-042-00;		ABB-\$292,853.04			
03-0412-072-00-00;		CPS-348,234.32			
03-0412-073-00-00;					
03-0412-076-01-00;					
03-0412-070-01-00;					
03-0412-074-00-00					

c) **Assumption or Rejection of Executory Contract/Unexpired Lease:** The following leases or executory contracts will be treated as follows:

Name of Creditor	Description of leased property or executory contract	Treatment	Current installment payments	Amount of arrearage to be paid	Treatment of arrearage (describe the method and time period of cure)	Estimated total payments by trustee
_____	_____	<input type="checkbox"/> Assume	\$_____	\$_____	_____	\$_____
		<input type="checkbox"/> Reject			_____	

III. THE CHAPTER 12 PLAN

a) FUNDING OF PLAN (INSTRUCTION: INCLUDE THE APPLICABLE FUNDING LANGUAGE)

The debtor certifies that all fees, charges and amounts required to be paid before confirmation pursuant to chapter 123 of Title 28 of the United States Code have been paid.

Debtor hereby submits future income in the amount of \$25,000 on December 15, 2021.

Debtor hereby submits future income in the amount of \$76,288.80 on January 31, 2022.

Debtor hereby submits future income in the amount of \$101,288.80 per year for a period of four years. Annual payments are to begin on January 31, 2023 and on January 31 each year for a period of four years.

b) PLAN DISBURSEMENTS (INSTRUCTION: INCLUDE THE APPLICABLE DISBURSEMENT LANGUAGE)

After deduction of ten percent (10%) from the above amount, to be applied towards administrative expenses, the trustee shall make disbursements as follows:

1. Treatment of Attorney's Fees: To the attorney's fees of the debtor in an amount not to exceed \$5,000, after approval by the Court, at the rate of \$1,000 per year, until paid in full. Payments in this amount will commence January 31, 2023. This amount may be reduced or increased by the trustee as necessary. In addition, Debtor will pay \$246.82 on December 15, 2021 and \$744.18 on January 31, 2022.

2. Treatment of Secured Claims: [INSTRUCTION: THE APPLICABLE LANGUAGE SET FORTH BELOW IS TO BE REPEATED FOR EACH SECURED CREDITOR AND FOR EACH CLASS OF COLLATERAL HELD BY A SECURED CREDITOR.]

If relief from the automatic stay is ordered as to any item of collateral listed in Part III(b)(2), then, unless otherwise ordered by the court, all payments as to that collateral will cease, and all secured claims based on that collateral will no longer be treated by the plan.

(i) Maintenance of payments and cure of default. The debtor will maintain the current contractual installment payments on the secured claims listed below, with any changes required by the applicable contract and noticed in conformity with any applicable rules. These payments will be paid by the debtor. Any existing arrearage on a listed claim will be paid in full through disbursements by the trustee, with interest, if any, at the rate stated.

Name of Creditor: _____

Claim No: _____ Claim Amount: _____

Collateral: _____

Amount of Arrearage (if any): _____

Arrearage payments: This creditor is to be paid \$ _____ per _____ for a period of _____ which includes interest at _____ % per annum.

(ii) Secured portion of claims altered by valuation and lien avoidance: (The remaining portion of the allowed claim will be treated as a general unsecured claim.)

Name of Creditor: Crop Production Services, Inc.

Collateral: real estate

This creditor is wholly secured in the amount of \$76,329 as of the effective date of Confirmation.

The unsecured portion of this creditor's claim is \$311,914.32.

This creditor is to be paid \$17,752.09 per year for a period of four years which includes interest at 5.25% per annum. Annual payments will commence January 31, 2023.

Other provisions for this creditor: In addition to the above payments, this creditor will be paid \$4,381.55 on December 15, 2021, and \$13,370.54 on January 31, 2022.

Name of Creditor: H&S Oil Co., Inc.

Collateral :real estate

This creditor is wholly secured in the amount of \$0 as of the effective date of Confirmation.

The unsecured portion of this creditor's claim is \$76,120.30.

This creditor is to be paid \$N/A per _____ for a period of _____ which includes interest at _____% per annum.

Other provisions for this creditor: Claim will be treated and paid as an unsecured claim See part 4 below.

(iii) Other secured debts (allowed claim to be paid in full without valuation or avoidance of lien):

Name of Creditor: Farm Service Agency

Claim No: 4 Claim Amount: \$25,340.29

Collateral: real estate- TMS 03-0412-042-00; 03-0412-072-00-00; 03-0412-073-00-00;
03-0412-076-01-00; 03-0412-070-01-00; and 03-0412-074-00-00

This creditor is wholly secured in the amount of 25,340.29 as of the effective date of Confirmation.

This creditor is to be paid \$1695.69 per year for a period of twenty-nine years which includes interest at 5.25% per annum. Annual payments will commence January 31, 2023.

Other provisions for this creditor: In addition to the above payments, this creditor will be paid \$418.53 on December 15, 2021, and \$1277.16 on January 31, 2022. Payments will be made through the trustee for the first five years and directly to the creditor thereafter.

Name of Creditor: Farm Service Agency

Claim No: 5 Claim Amount: \$96,630.43

Collateral: farm machinery and equipment

This creditor is wholly secured in the amount of \$96,630.43 as of the effective date of confirmation.

This creditor is to be paid \$14,503.14 per year for a period of six years which includes interest at 1.25% per annum. Annual payments will commence January 31, 2023.

Other provisions for this creditor: In addition to the above payments, this creditor will be paid \$3,579.65 on December 15, 2021, and \$10,923.49 on January 31, 2022. Payments will be made through the trustee for the first five years and directly to the creditor thereafter.

Name of Creditor: ArborOne, ACA

Claim No: Not filed Claim Amount: \$56,609.30

Collateral: irrigation system and farm machinery and equipment

This creditor is wholly secured in the amount of \$56,609.30 as of the effective date of confirmation.

This creditor is to be paid \$13,165.81 per year for a period of four years which includes interest at 5.25% per annum. Annual payments will commence January 31, 2023.

Other provisions for this creditor: In addition to the above payments, this creditor will be paid \$3,249.57 on December 15, 2021, and \$9,916.24 on January 31, 2022. If the Debtor fails to pay his Trustee within 60 days of the due date, the Debtor consents to relief from the automatic stay as to this creditor.

(i)

Name of Creditor: Anderson Brothers Bank

Claim No: not filed Claim Amount: \$218,503.68

Collateral: real estate- TMS 03-0412-042-00; 03-0412-072-00-00; 03-0412-073-00-00; 03-0412-076-01-00; 03-0412-070-01-00; and 03-0412-074-00-00

This creditor is wholly secured in the amount of \$218,503.68 as of the effective date of confirmation.

This creditor is to be paid \$14,621.60 per year for a period of twenty-nine years which includes interest at 5.25% per annum. Annual payments will commence January 31, 2023.

Other provisions for this creditor: In addition to the above payments, this creditor will be paid \$3,608.89 on December 15, 2021, and \$11,012.71 on January 31, 2022. Payments will be made through the trustee for the first five years and directly to the creditor thereafter.

Name of Creditor: Anderson Brothers Bank

Claim No: not filed Claim Amount: \$292,853.04

Collateral: real estate- TMS 03-0412-042-00; 03-0412-072-00-00; 03-0412-073-00-00; 03-0412-076-01-00; 03-0412-070-01-00; and 03-0412-074-00-00; equipment and crops

This creditor is wholly secured in the amount of \$292,853.04 as of the effective date of confirmation.

This creditor is to be paid \$19,596.83 per year for a period of twenty-nine years which includes interest at 5.25% per annum. Annual payments will commence January 31, 2023.

Other provisions for this creditor: In addition to the above payments, this creditor will be paid \$4,836.87 on December 15, 2021, and \$14,759.96 on January 31, 2022. Payments will be made through the trustee for the first five years and directly to the creditor thereafter.

(i) Surrender of collateral. The collateral held by each creditor listed below is hereby surrendered. No payment will be made to this creditor. The debtor requests that upon confirmation of this plan the stay under 11 U.S.C. § 362(a) be terminated as to the collateral only and the stay under § 1201 be terminated in all respects. Any allowed unsecured claim resulting from the disposition of the collateral will be treated in section 4 below.

Name of Creditor Collateral

N/A the plan does not provide for the surrender of collateral.

3. Treatment of Priority Claims.

(i) Domestic Support Claims. 11 U.S.C. § 507(a)(1):

a. Pre-petition arrearages. The trustee shall pay the pre-petition domestic support obligation arrearage to (name of DSO creditor), at the rate of \$ or more per until the balance, without interest, is paid in full.

b. The debtor shall pay all post-petition domestic support obligations as defined in 11 U.S.C. § 101(14A) on a timely basis directly to the creditor.

c. Any party entitled to collect child support or alimony under applicable non-bankruptcy law may collect those obligations coming due after this case was filed from the income or assets of the debtor-parent/spouse without further order or relief from the automatic stay. (Any claim for child support or alimony due before this case was filed must be collected in accordance with 11 U.S.C. § 507(a)(1) and 11 U.S.C. § 1222(a)(2).)

(ii) Other Priority debt.

Subsequent to the above, payments to priority creditors, including tax claims, will be paid on a pro-rata basis until paid in full. These are as follows: [INSTRUCTION: THE FOLLOWING SHOULD BE COMPLETED FOR EACH PRIORITY CREDITOR.]

Name of Creditor: Internal Revenue Service

Claim No: 1 Claim Amount: \$17,473.79

This creditor is to be paid \$3,494.76 per year for a period of four years which includes interest at 0% per annum. Annual payments will commence January 31, 2023.

Other provisions for this creditor: In addition to the above payments, this creditor will be paid \$862.57 on December 15, 2021, and \$2632.19 on January 31, 2022

This creditor shall be paid no interest on its claim.

4. Treatment of Unsecured Claims.

Subsequent to the above, unsecured creditors will be paid on a pro rata basis. Unsecured creditors will be paid not less than 5% of the total allowed unsecured, non-priority claim. Debtor will pay \$1,315.55 on December 15, 2021 and \$4,014.45 on January 31, 2022. Commencing January 31, 2023, and continuing for a period of four years, Debtor will pay four annual payments in the amount of \$5,330. Interest will not be paid on this claim.

IV. ADDITIONAL PLAN PROVISIONS

Upon confirmation of the plan, the debtor shall tender to the Chapter 12 Trustee, at the time the debtor's first payment under the Plan is due, \$200.00 to pay the bank fees associated with the bank account to be opened by the trustee for the debtor's plan payments. On the 12th month thereafter, the debtor shall pay to the trustee \$200.00 to pay the bank fees, or an amount agreed to by the debtor and the trustee. Should the bank fees exceed the annual \$200.00 payment, the trustee reserves the right to apply for reimbursement for the excess as an administrative expense. Upon completion of the Plan, or dismissal of the debtor's bankruptcy case, the trustee shall return to the debtor any funds not needed to pay the bank fees.

Upon confirmation of the plan, property of the estate will remain property of the estate, but title to the property shall revert in the debtor. Unless the plan otherwise provides, secured creditors shall retain their liens upon their collateral until the allowed amounts of their claims are paid in full.

Except as provided herein, the automatic stay provisions of 11 U.S.C. § 362(a) shall remain in effect until the case is closed, but may be modified pursuant 11 U.S.C. § 362(d) on motion of a party in interest.

The effective date of confirmation is the date upon which the order of confirmation becomes final.

October 15, 2021

/s/Reid B. Smith
Reid B. Smith, attorney for Debtor
1712 St. Julian Place, Suite 102
Columbia, SC 29204
(803) 779-2255
(803) 799-3131 (fax)
rsmith@birdsmithlaw.com
District Court ID 4200

FEASIBILITY ANALYSIS

JT OWENS CONSTRUCTION Inc

	2017	2018	2019	2020	average
gross	187614	146412	166353	273982	193590.25
expenses	83555	106420	71270	197869	114778.5
net	104059	39992	95083	76113	78811.75
monthly average					6567.65

monthly living expenses see attached schedule J 7146.5

net -578.85

Projected Net Farm Income - see attached

corn	\$21,165
soybeans	\$70,840
wheat	29,875
total	\$121,880

farm program payments

	2017	2018	2019	2020	average
	39244	7882	22582	35244	26238

total projected farm income \$148,118

Plan payments 101,288.80

living expenses to be paid with farm income -6946.25

available cash for next farm year expenses 39,882.95

Fill in this information to identify your case:

Debtor 1 Jeffrey Thomas Owens

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: DISTRICT OF SOUTH CAROLINA

Case number 21-02133
(If known)

Check if this is:

- ☐ An amended filing
- ☐ A supplement showing postpetition chapter 13 expenses as of the following date:

MM / DD / YYYY

Official Form 106J

Schedule J: Your Expenses

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach another sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Your Household

1. Is this a joint case?

☒ No. Go to line 2.

☐ Yes. Does Debtor 2 live in a separate household?

☐ No

☐ Yes. Debtor 2 must file Official Form 106J-2, *Expenses for Separate Household* of Debtor 2.

2. Do you have dependents? ☒ No

Do not list Debtor 1 and Debtor 2.

☐ Yes. Fill out this information for each dependent.....

Dependent's relationship to Debtor 1 or Debtor 2

Dependent's age

Does dependent live with you?

Do not state the dependents names.

- ☐ No
☐ Yes
☐ No
☐ Yes
☐ No
☐ Yes
☐ No
☐ Yes

3. Do your expenses include expenses of people other than yourself and your dependents? ☒ No
☐ Yes

Part 2: Estimate Your Ongoing Monthly Expenses

Estimate your expenses as of your bankruptcy filing date unless you are using this form as a supplement in a Chapter 13 case to report expenses as of a date after the bankruptcy is filed. If this is a supplemental *Schedule J*, check the box at the top of the form and fill in the applicable date.

Include expenses paid for with non-cash government assistance if you know the value of such assistance and have included it on *Schedule I: Your Income* (Official Form 106I.)

Your expenses

4. The rental or home ownership expenses for your residence. Include first mortgage payments and any rent for the ground or lot.

4. \$ 0.00

If not included in line 4:

4a. Real estate taxes

4a. \$ 0.00

4b. Property, homeowner's, or renter's insurance

4b. \$ 0.00

4c. Home maintenance, repair, and upkeep expenses

4c. \$ 0.00

4d. Homeowner's association or condominium dues

4d. \$ 0.00

5. Additional mortgage payments for your residence, such as home equity loans

5. \$ 0.00

Debtor 1 **Jeffrey Thomas Owens**

Case number (if known) **21-02133**

6. Utilities:	
6a. Electricity, heat, natural gas	6a. \$ <u>459.00</u>
6b. Water, sewer, garbage collection	6b. \$ <u>20.00</u>
6c. Telephone, cell phone, Internet, satellite, and cable services	6c. \$ <u>380.00</u>
6d. Other. Specify: _____	6d. \$ <u>0.00</u>
7. Food and housekeeping supplies	7. \$ <u>650.00</u>
8. Childcare and children's education costs	8. \$ <u>0.00</u>
9. Clothing, laundry, and dry cleaning	9. \$ <u>208.00</u>
10. Personal care products and services	10. \$ <u>67.50</u>
11. Medical and dental expenses	11. \$ <u>564.00</u>
12. Transportation. Include gas, maintenance, bus or train fare. Do not include car payments.	12. \$ <u>511.00</u>
13. Entertainment, clubs, recreation, newspapers, magazines, and books	13. \$ <u>40.00</u>
14. Charitable contributions and religious donations	14. \$ <u>30.00</u>
15. Insurance. Do not include insurance deducted from your pay or included in lines 4 or 20.	
15a. Life insurance	15a. \$ <u>0.00</u>
15b. Health insurance	15b. \$ <u>1,967.00</u>
15c. Vehicle insurance	15c. \$ <u>0.00</u>
15d. Other insurance. Specify: Agribusiness, home & auto insurance policy	15d. \$ <u>2,250.00</u>
16. Taxes. Do not include taxes deducted from your pay or included in lines 4 or 20. Specify: _____	16. \$ <u>0.00</u>
17. Installment or lease payments:	
17a. Car payments for Vehicle 1	17a. \$ <u>0.00</u>
17b. Car payments for Vehicle 2	17b. \$ <u>0.00</u>
17c. Other. Specify: _____	17c. \$ <u>0.00</u>
17d. Other. Specify: _____	17d. \$ <u>0.00</u>
18. Your payments of alimony, maintenance, and support that you did not report as deducted from your pay on line 5, Schedule I, Your Income (Official Form 106I).	18. \$ <u>0.00</u>
19. Other payments you make to support others who do not live with you. Specify: _____	19. \$ <u>0.00</u>
20. Other real property expenses not included in lines 4 or 5 of this form or on Schedule I: Your Income.	
20a. Mortgages on other property	20a. \$ <u>0.00</u>
20b. Real estate taxes	20b. \$ <u>0.00</u>
20c. Property, homeowner's, or renter's insurance	20c. \$ <u>0.00</u>
20d. Maintenance, repair, and upkeep expenses	20d. \$ <u>0.00</u>
20e. Homeowner's association or condominium dues	20e. \$ <u>0.00</u>
21. Other: Specify: _____	21. +\$ <u>0.00</u>
22. Calculate your monthly expenses	
22a. Add lines 4 through 21.	\$ <u>7,146.50</u>
22b. Copy line 22 (monthly expenses for Debtor 2), if any, from Official Form 106J-2	\$ _____
22c. Add line 22a and 22b. The result is your monthly expenses.	\$ <u>7,146.50</u>
23. Calculate your monthly net income.	
23a. Copy line 12 (<i>your combined monthly income</i>) from Schedule I.	23a. \$ <u>7,923.58</u>
23b. Copy your monthly expenses from line 22c above.	23b. -\$ <u>7,146.50</u>
23c. Subtract your monthly expenses from your monthly income. The result is your <i>monthly net income</i> .	23c. \$ <u>777.08</u>
24. Do you expect an increase or decrease in your expenses within the year after you file this form? For example, do you expect to finish paying for your car loan within the year or do you expect your mortgage payment to increase or decrease because of a modification to the terms of your mortgage?	
<input checked="" type="checkbox"/> No.	
<input type="checkbox"/> Yes.	Explain here: _____

Beans						
	acres	yield	total bushels	price	revenue	
	290	40	11600	total crop		
			2000	13.1	26200	(booked)
			9600	12.4	119040	
					145240	
expenses						
	seed	55			15950	
	chemicals	75			21750	
	fertilizer	50			14500	
	fuel	5			1450	
	labor	5			1450	
	repairs	10			2900	
	crop ins	20			5800	
	combine/hauling	55			2200	
	land rent	35	(240 acres)		8400	
	total				74400	
net					70840	

CORN					
		ACRES	BU/ACRE	PRICE BU	REVENUE
		83	120	5.3	52788
	EXPENSES				
		seed	70		5810
		fertilizer	125		10375
		chemicals	50		4150
		combine/hauling	55		4565
		crop ins	18		1494
		fuel	13		1079
		labor	5		415
		repairs	10		830
		land rent	35		2905
		TOTAL			31623
	NET				21165

WHEAT				
	ACRES	BU/ACRE	PRICE BU	REVENUE
	150	75	6.5	73125
EXPENSES		COST PER ACRE		
	seed	45		6750
	fertilizer	100		15000
	chemicals	15		2250
	fuel	10		1500
	labor	10		1500
	repairs	10		1500
	crop ins	20		3000
	combine/hauling	55		8250
	land rent	35	(100 acres)	3500
	TOTAL			43250
NET				29875

Oct 12, 2021 LIQUIDATION ANALYSIS								
I. REAL ESTATE								
property	liens	tax value		equity after Sr lien	secured	Equity		
residence 03-0412-074-01-00		121,600				0		
	exemption		63250					
	equity		58350					
	CPS		388234.32	0	58350			
	H & S		76120.3		0			
10.24 acres 03-0412-042-02-00		17979						
	CPS		388234.32	0	17979	0		
	H & S		76120.3		0			
total secured	cps				76329			
	H & S				0			
50% with brother:								
29.34 acres 03-0412-042-00		35945				0		
37.5 acres 03-0412-072-00-00		80537				0		
36.7 acres 03-0412-073-00-00		48084				0		
10.22acres 03-04122-076-01-00		30660				0		
15.1 acres 03-0412-070-01-00		42954				0		
33.62 acres 03-0412-074-00-00		41301				0		
79.5 acres		97682				0		
total		377163				0		
liens	FSA	25340.29		351822.71	25340.29			
	ABB	218503.68		133319.03	218503.68			
	ABB	292853.04		-159534	133319.03			
	CPS	388234.32			0			
	H & S	76120.3			0			

II. FARM MACHINERY & EQUIPMENT								
asset	lienholder	value	debt	equity after Sr lien		equity		
3 center pivots & pump	ArborOne	45,000	56609.3			0		
see attached list	FSA	114,250	96,630.43	17,619.57		0		
	ArborOne		56609.3					
III. CROPS								
83 acres corn (estimated value)	Anderson Bros Bank	52788	2992853			0		
290 acres soybeans (estimated value)	Anderson Bros Bank	145240				0		
					exemption			
IV. VEHICLES								
2012 Ford F150	n/a	3500				3500		
1998 Ford F150	n/a	2500				2500		
2005 Ford F150	n/a	3,000				3000		
Ford Expedition	n/a	18000			6325	11675		
2010 Ford F150	n/a	8500				8500		
V. OTHER PERSONAL PROPERTY								
furnishings and HHG's		6265			6265	0	wildcard - \$1,215	
firearms		5600			2200	3400		
bank accounts & cash		22,196			5110	17,086	wildcard-\$5,110	
100% s/h JT Owens Const. Inc.	Anderson Bros Bank	160,600	61,574.86	99,025				
	FSA		96630.43			2,395		
TOTAL NON-EXEMPT EQUITY						52055.64		

COSTS OF LIQUIDATION								
10% auctioneer (vehicles	3550							
ch 7 trustee - (62963.19)	6648.16							
TOTAL	10198.16							
attorney fees (estimated)	7500							
available for unsecured claims	34357.48							
less priority debt	17473.79							
available for general unsecured claims	16883.69							
Unsecured claims:								
Deficiency claims								
Crop Production Services	311,914.32							
H & S Oil	76,120.30							
TOTAL	388,034.62							
unsecured claims								
Toyota	8000							
IRS	6058.33							
Anderson Bros Bank	61,574.86							
Anderson Bros Bank	1,517.65							
Carolina Eastern	30,000.00							
Farm Plan	30,000.00							
Finanacial Data System (Coastal Eye Gr.)	54.00							
Finanacial Data System (PD Pathology)	45.00							
Merchants AD	1,629.80							
Nichols Farm Supply	6,098.25							
TOTAL	144977.89							
total unsecured claims	533,012.51							
% available	0.031675973							

Debtor 1 **Jeffrey Thomas Owens**

Case number (if known) **21-02133**

Part 6: Describe Any Farm- and Commercial Fishing-Related Property You Own or Have an Interest In.
If you own or have an interest in farmland, list it in Part 1.

46. Do you own or have any legal or equitable interest in any farm- or commercial fishing-related property?

- ☐ No. Go to Part 7.
☒ Yes. Go to line 47.

Current value of the portion you own?
Do not deduct secured claims or exemptions.

47. **Farm animals**

Examples: Livestock, poultry, farm-raised fish

- ☒ No
☐ Yes.....

48. **Crops—either growing or harvested**

- ☐ No
☒ Yes. Give specific information.....

approx. 289 acres soybeans

Unknown

approx 83 acres corn

Unknown

49. **Farm and fishing equipment, implements, machinery, fixtures, and tools of trade**

- ☐ No
☒ Yes.....

Westfield grain auger 8 in X 60 ft 1994 75382

\$900.00

Westfield grain auger 8 in X 60 ft 2003

\$1,200.00

Grain Drill
JD 450

\$3,500.00

Grain Bin
6000 Bushel
New

\$600.00

Grain Bin
6000 Bushel
Old

\$600.00

Grain Bin
3200 bushel

\$300.00

Toyota Forklift
with bale clamps
4-7339-TPT

\$8,000.00

Debtor 1 Jeffrey Thomas Owens

Case number (if known) 21-02133

JD 7320 Tractor 2003 RW7320R001941	\$38,000.00
60KW Generator PTO	\$2,500.00
JD Tractor 5425 with loader	\$28,000.00
International truck 4300	\$10,000.00
Mule	\$2,500.00
Honda 4 wheel	\$1,200.00
John Deere HX1400 Cutter 14 feet	\$1,800.00
Irrigation pump electric	\$1,800.00
grain auger	\$800.00
Ford 3930 1991	\$5,000.00
Truck trailer yellow 1974	\$1,500.00
Holland tobacco Setter 4 row with Fert Hopper (junk)	Unknown
Hollan tobacco Setter 4 row with Fert Hopper (junk)	Unknown
2 Large water tanks	\$200.00
Rino Ditch Cutter 11347	\$1,200.00
Spreader	\$300.00
JD disk	\$1,500.00
6000 gal nitrogen tank	\$800.00
10' drag harrow	\$250.00